

June 15, 2014

Mr. James Saric
Remedial Project Manager
USEPA Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3511

Subject: Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies
Monthly Progress Report, May 2014

Dear Jim:

Attached is the 87th monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site (Site) Supplemental Remedial Investigations/Feasibility Studies (SRI/FS). The monthly progress report is submitted per Paragraph 37 of the February 2007 Administrative Settlement Agreement and Order on Consent (AOC), Docket No. V-W-07-C-864, and Section 7.1 of the associated Statement of Work (SOW). This report is also submitted per Paragraph 19a of the 2007 AOC for Removal Action (Docket No. V-W-07-C-863) and Paragraph 19a of the 2009 AOC for Removal Action (Docket No. V-W-09-C-925).

If you have any questions, please do not hesitate to contact me.

Sincerely,



L. Chase Fortenberry, PG
Senior Remediation Project Manager
Environmental Engineering, Environmental Affairs
Georgia-Pacific LLC

Attachments

cc: Michael Berkoff, USEPA
Ramon Mendoza, USEPA
Paul Bucholtz, MDEQ
Judith Alfano, MDEQ
Sharon Hanshue, MDNR
Mark Mills, MDNR
Jeff Keiser, CH2M HILL
Todd King, CDM-Smith

Todd Goeks, NOAA
Jessica Winter, NOAA
Julie Sims, NOAA
Lisa Williams, USFWS
Richard Gay, Weyerhaeuser Company
Martin Lebo, Ph.D., Weyerhaeuser Company
Kathy Huibregtse, ENVIRON
Garry Griffith, P.E., Georgia-Pacific LLC
Garret E. Bondy, P.E., AMEC E&I, Inc.

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS**

REPORT #87, MAY 2014

Significant Developments and Activities during the Period:

- On May 7, 2014, Georgia-Pacific received a letter from USEPA approving modification of the SRI/FS start dates for Areas 5, 6, and 7 to September 1, 2015, September 1, 2016, and September 1, 2017, respectively.
- On May 8, 2014, Georgia-Pacific and AMEC submitted a memorandum of comments to MDNR regarding the pending Otsego City Dam removal and water control structure design plans.
- On May 8, 2014, USEPA, Georgia-Pacific, and their consultants participated in a conference call meeting to discuss the approach to Area 1 dispute resolution and the *Final Area 1 FS* submittal.
- On May 9, 2014, Georgia-Pacific's contractor Cardo JFNew completed the remaining bank maintenance – shrub planting in the Plainwell No. 2 Dam Area.
- On May 12, 2014, Georgia-Pacific submitted a letter to USEPA which contained a proposal for outlining a sampling strategy to assess Area 1 residential floodplain exposure.
- On May 13 and 21, 2014, USEPA, MDEQ, Georgia-Pacific, and their consultants participated in work group conference call meetings to discuss preparation of the Area 4 SRI/FS Field Sampling Plan.
- On May 13, 2014, Georgia-Pacific submitted a letter to USEPA requesting extension of the Area 2 ASTM due date to August 1, 2014.
- On May 16, 2014, AMEC, on behalf of Georgia-Pacific, submitted an email with action items from the May 13, 2014 Area 4 Field Sampling Plan work group conference call to USEPA, MDEQ, and their consultants.
- On May 21, 2014, Georgia-Pacific submitted a letter to USEPA requesting extension of the Area 3 ASTM due date to August 25, 2014.
- On May 21, 2014, AMEC, on behalf of Georgia-Pacific, submitted draft notes from spring 2014 Area 4 reconnaissance and survey activities to USEPA, MDEQ, and their consultants.
- On May 22, 2014, Georgia-Pacific submitted proposed sample language which would be added to the *Final Area 1 FS* upon resolution of the dispute.
- On May 22, 2014, Georgia-Pacific received an email from USEPA approving a 45-day extension for payment of USEPA oversight invoices received on April 28, 2014.
- On May 27, 2014, Georgia-Pacific received a letter from USEPA granting extension of the Area 2 and 3 ASTM due dates to August 1, 2014 and August 25, 2014, respectively.
- On May 28, 2014, USEPA, MDEQ, Georgia-Pacific, and their consultants met to confirm agreement on the strategy for Area 1 dispute resolution. The meeting also included discussion of overall schedule and progress related to OU5 of the Superfund Site.
- On May 28, 2014, Georgia-Pacific submitted a request to USEPA, via email, requesting extension of the Area 1 dispute resolution negotiation period deadline to June 16, 2014.
- On May 29, 2014, USEPA, MDEQ, MDNR, MDCH, Georgia-Pacific, and their consultants participated in a work group meeting to discuss collaborative plans for future long-term monitoring activities for OU5 of the Superfund Site.

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS**

REPORT #87, MAY 2014

- On May 30, 2014, Georgia-Pacific submitted a letter to USEPA summarizing the Area 1 dispute resolution strategy agreed to during the May 28, 2014 meeting.
- On May 30, 2014, USEPA, MDEQ, Georgia-Pacific, and their consultants participated in a work group meeting to discuss preparation of the Area 4 SRI/FS Field Sampling Plan.
- Georgia-Pacific awaits the following:
 - MDEQ's complete response to the January 9, 2013 Freedom of Information Act request.
 - USEPA and MDEQ comments on the *Draft Area 3 SRI Report*.
 - USEPA and MDEQ comments on the revised *Draft Area 2 SRI Report*.
 - MDEQ comments on the April 8, 2014 scope of work for the non-PCB constituent screening.

Data Collected and Field Activities Conducted during the Period

- Area 4 reconnaissance and survey field activities were conducted from April 21 to May 1, 2014.
- AMEC completed a topographic survey of the Trowbridge Dam area on May 5, 2014.

Laboratory Data Received during the Period

- None.

Problems

- None.

Actions Taken to Correct Problems

- NA.

Developments Anticipated during the Next Two Reporting Periods

- Georgia-Pacific anticipates scheduling and conducting a collaborative inspection of the Plainwell No. 2 area banks and restored habitats with USEPA and the Trustees on June 5, 2014.
- Georgia-Pacific anticipates resolution of the disputed items on the *Area 1 FS* and submittal of the revised FS by June 16, 2014.
- Georgia-Pacific anticipates continued meetings with USEPA, MDEQ, and their consultants through work group meetings to discuss preparation of the Draft Area 4 Field Sampling Plan and LTM protocols.